



**American Federation
of Labor and
Congress of Industrial
Organizations**

815 Black Lives Matter
Plaza NW
Washington, DC 20006
202-637-5000
aflcio.org

EXECUTIVE COUNCIL

ELIZABETH H. SHULER
PRESIDENT

FREDRICK D. REDMOND
SECRETARY-TREASURER

Cecil Roberts
Matthew Loeb
Randi Weingarten
Baldemar Velásquez
Lee A. Saunders
Sean McGarvey
Stuart Appelbaum
Mark Dimondstein
Sara Nelson
Eric Dean
Gabrielle Carteris
Mark McManus
Elissa McBride
John Samuelson
Vonda McDaniel
Gwen Mills
Charles Wovkanech
Bonnie Castillo
Ernest A. Logan
James Slevin
John Costa
Tim Driscoll
Everett Kelley
Anthony Shelton
Edward A. Kelly
Evelyn DeJesus
Cheryl Eliano
Matthew S. Biggs
Roxanne Brown
Arthur Maratea
James A. Williams Jr.
Ben Valdepeña
Meghann Burke
Bernie Burnham
Frank Christensen
Roland Rexha
Jason Ambrosi
Kenneth Cooper
Brian Renfro
Shawn Fain
Brent Booker
Michael Coleman
Claude Cummings Jr.
David Heindel
Margaret Mock
David McCall
Brian Bryant
Lloyd Howell
Nick Daniels
April Verrett
Rocio Sáenz
John Downey
Tyler Turner
Milton Jones

AFL-CIO

AMERICA'S UNIONS

July 23, 2025

Amanda Wood Laihow
Assistant Secretary for Occupational Safety and Health
U.S. Department of Labor
200 Constitution Ave., N.W.
Washington, DC 20210

Re: Request for comments on OSHA's proposed rulemaking for Safety Color Code for Marking Physical Hazards; Textiles; Sawmills; Safety Color Code for Marking Physical Hazards for Shipyard Employment (Docket No. OSHA-2025-0009)

Dear Acting Assistant Secretary Laihow,

The American Federation of Labor and Congress of Industrial Organizations (AFL-CIO) requests a 60 day extension of the comment periods and informal rulemaking hearings for the Occupational Safety and Health Administration (OSHA) notice of proposed rulemaking (NPRM) regarding provisions to the Safety Color Code for marking physical hazards.

Additional time is crucial for ensuring our membership in their respective workplaces is adequately represented. The AFL-CIO's membership is expansive and diverse, with many directly affected by the proposed rules. We represent 63 affiliated labor unions with nearly 15 million working people across a wide variety of industries in health care, construction, manufacturing, fire service, emergency response, transportation, education, entertainment, athletics, and many other sectors. We have more than 50 years of experience commenting on OSHA rulemakings.

Additional time is crucial to make it through the volume of information noticed and requested by the agency. On or after July 1, 2025, OSHA alone issued dozens of deregulatory actions, many with comment deadlines of September 2, 2025, right after the nation's Labor Day holiday and summer holiday schedules. We also are reviewing and commenting on proposals from many different federal

agencies under the same time frame, including three dozen deregulatory actions from other agencies in the U.S. Department of Labor, some with comment deadlines as early as July 31, 2025.

Also, without the opportunity for submission, review and comment through the Advisory Committee on Construction Safety and Health, stakeholders have not had an adequate length of time to preliminarily review and digest any regulatory actions that may be construction-related before release for public comment.

Thank you for your consideration of this important request.

Sincerely,

A handwritten signature in black ink, appearing to read "Reindel", is centered on a light gray rectangular background.

Rebecca L. Reindel, MS, MPH

Safety and Health Director